<u>REMARKS</u>

The previous rejections have been withdrawn. The reconsideration of the application is appreciated. The new positions taken in the office action are addressed as follows.

Claims 3, 6, 15, 17, 18, 21, 22, 23, 24 and 30 stand rejected under § 102(e) as being anticipated by Wolff, U.S. 6,738,841. The rejection is respectfully traversed.

Wolff is directed to a system in which a browser client can work with a print server through a network by an exchange of web pages such as the pages shown in Figs. 3A, 3B and Fig. 4. This is enabled with a print server that is "a printer agency that may be used to provide a document centric interface" (Column 9, lines 5 and 6). The server 255 provides "a document centric interface to" printers 250. Printing occurs when an interface is established between a client 210 and a network server. The system of Wolff avoids the necessity for a host computer, but requires a browser exchange to affect printing and requires that the client be attached to the network. The network oriented system of Wolff is significantly different from the claimed invention.

With respect to claim 3, the office action on page 3 points to column 6, lines 7-20 of Wolff as disclosing the claim requirement that the reference specify print format information. The section of Wolff in column 6 is discussing the view page 350 that includes an "OPTIONS" button. The view page 350 is "displayed on a browser 320 residing in a client 210." (Column 6, lines 12-13). This does not meet the claim language. In claim 3, the reference that is wirelessly communicated to another device is "to initiate a print by reference of the print content". It is this reference that is used to initiate a print by reference that specifies the print format information in claim 3. That is

neither met nor suggested by the view page 350 in column 6 of Wolff. The view page is returned to the client by the print server and includes an OPTION button. Even if selection of the OPTION button permits the communication of print format information, the use of the OPTION button is not a reference that initiates a print by reference as required by claim 3.

Regarding claim 6, the office action on page 3 cites column 4, lines 65 to column 5, line 3 of Wolff as disclosing the claim 6 limitation that "the reference specifies a number of copies of the print content to be printed by a print device." There is no such disclosure in the cited portion of Wolff. Column 5, line 1 mentions "a compound document". This compound document is said to be "linked documents that are located within a received document." (Column 5, lines 2-3). This does not discuss printing a number of copies of any particular document, whether it is a compound document or some other form of document. In addition, it is apparent that the same interpretation mistake has been made with respect to claim 6 that was made with respect to claim 3. In claim 6, the number of copies of the print content to be printed is specified by the reference that is sent "to another device to initiate a print by reference of the print content."

Regarding each of claims 3, 6, 15, 17, 21 and 30, there is also another misinterpretation of a claim limitation that is used as the basis to apply Wolff to the claims. In each of the claims, the reference that is used to initiate a print by reference of the print content also indicates the location of the print content. This is made clear by the phrase "a reference to print content stored at a location indicated by the reference." As is made clear in column 5, lines 33-62, Wolff's initial communication between a client 210

is with a print server 255 and the print server 255 and 210 creates an HTML session and permits the client to select documents within the browser for printing. Thus, for example, Fig. 6 illustrates a book selection page displayed on a browser 320 for a client from which the client may select documents for printing. The initial communications in Wolff's system are to establish a browser session with a client. Outside of a browser session, Wolff does not disclose any form of printing by reference.

In each of the claims 3, 6, 15, 17, 21 and 30, the information included in the reference refers to the reference that is used to initiate a print by reference operation and the reference includes the location of the print content reference for printing. There is no comparable communication from the client 210, which is conducting an HTML session that is initiated through a standardized HTML session. Documents are selected for printing only within a browser interface.

Claim 2 stands rejected under § 103 over Wolff in view of Wolff U.S. Patent 5,848,413. First, Wolff '841 is not properly applied to claim 2, as in the claims discussed above, because the reference that initiates the print by reference of the print content includes specific information. In claim 2, the reference indicates the location of the print content. Additionally, the reference specifies billing information. Neither of these features are disclosed by Wolff '841. As discussed above, Wolff '841 initiates a browser session between a client 210 and a print server 255. The initial communications in Wolff are to establish a browser session and there is nothing corresponding to a reference that is used to initiate the print by reference of print content, wherein the reference both indicates the location at which the print content is stored and includes billing information.

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The proposed modification is to use Wolff '413. At best, Wolff '413 merely suggests paying for content. The claim is not directed to the general concept of paying for content that is printed. Instead, the claim specifies that the reference used to initiate the print operation and which indicates the location of the print content includes billing information. The portion of column 10, lines 17-24 of Wolff '413 does not include any discussion of billing information or including billing information in a reference used to initiate a print by reference. Wolff '413 is directed to a fax method for ordering documents. Wolff '841 is concerned with a browser method for ordering documents. Neither operation is a print by reference operation within the meaning of the reference that is defined in the claims.

Claim 4 stands rejected under Wolff '841 in view of Lamming. The rejection is respectfully traversed. The differences between Wolff '841 and claim 4 are greater than is recognized in the office action. Again, as with respect to claims discussed above, the application of Wolff '841 fails to recognize that claim 4 requires that the reference that is used to initiate a print by reference includes both the location of the print content and time and date information. Wolff is directed to a browser session initiated by standard HTML communications. Within a browser session, a client 210 may use the browser to order a particular document.

Also there is no motivation to combine Wolff and Lamming. Wolff concerns a browser session that is used for "providing access to interconnected on-line documents." Column 2, lines 66-67. Lamming is concerned with tracking users. When a user, namely, a person, encounters another object, a time stamped record is created in the database concerning that user. Column 4, lines 48-64. The arrival of people to their own

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or other's offices is tracked in a database as shown in Table 1 and Table 2. Lamming is completely unconcerned with document ordering, which is the sole purpose of the web based document ordering system of Wolff '841.

The stated motivation for combination is "to more clearly specify the images to be retrieved." This has no basis in the Lamming reference, as Lamming is concerned with tracking the movements of the users. It is not clear at all how tracking a user's relationship to other objects in a database relates to "more clearly specify the images to be retrieved."

Also, the combination taken together does not suggest the invention of claim 4. In claim 4 the reference that is to the location of print content and which is used to initiate a print by reference also includes time and date information. Time and date stamps are used in Lamming, but as seen in Tables 1 and 2 these concern the movements of people. They track the locations of users in kitchens and offices and the like.

Claims 32 and 33 stand rejected under Wolff '841 in view of Nachtsheim. The rejection is respectfully traversed. The combination is first objected to is lacking any motivation. The stated motivation is "to improve the communication process". First, it is not clear how Nachtsheim improves the "communication process". Second, it is also noted that the stated motivation is generic and cannot be used to support a combination of any two particular references. "To improve the communication process" is a platitude that could be applied to any system involving communications.

Also, the combination is inappropriate because Nachtsheim is specific to a very particular application, namely, the detection of active devices that may interfere with airline navigational equipment during takeoff or landing. Column 1, lines 5-13.

According to Nachtsheim, a central radio 100 detects active devices, permitting airplane cockpit crew or flight attendants to monitor to insure that devices are turned off. The system of Nachtsheim has nothing whatsoever to do with the browser interface for ordering documents which is disclosed in Wolff. If the references were combined, it might suggest that the client 210, if it were a PDA, could be detected by an airline crew, but it suggests no other modification to the Wolff reference.

Indeed, detecting the client 210 is not a modification of any communication protocol that is disclosed in Wolff. Nachtsheim is fully and solely concerned with detecting devices so that they may be properly shut down. Commands are communicated to the device telling them to shut down.

Also, Wolff '841 fails to disclose particular features of claims 32 and 33. In claims 32 and 33, the reference to print content stored at an internet location is indicated by the reference that is sent by the portable device. In addition, the portable device wirelessly communicates the communication signal including the reference to a print device. In Wolff, Fig. 9 shows the wireless PDA communication embodiment of Wolff. The PDA wirelessly communicates with the network, as disclosed in column 8, lines 48-53.
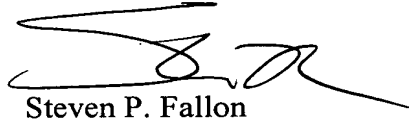
In claim 33 the reference is wirelessly communicated to the print service. Wolff discloses wireless communication with the network. Importantly, the invention of claims 32 and 33 allows the use of stand-alone printers and print services outside a network to be used for a print by reference operations.

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For all of the above reasons, reconsideration and allowance of the application is requested. Should the examiner have any questions concerning this response, the examiner if invited to contact the undersigned attorney at the below-listed number.

Respectfully submitted,

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